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## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF IDAHO

In re:

HIPWELL, TERRY,

Debtor.

Case NO. 96-02095

MOTION TO DISMISS AND NOTICE OF HEARING

COMES NOW the Travelers Insurance Company ("Travelers"), secured creditor and party in interest, and moves this Court for an Order dismissing this bankruptcy proceeding under and pursuant to 11 U.S.C. § 1208(c)(1), for unreasonable delay which is prejudicial to creditors, and 11 U.S.C. § 1208(c)(9) for continuing loss to or diminution of the estate and the absence of a reasonable likelihood of rehabilitation. This Motion is filed under and pursuant to Federal Rule of Bankruptcy Procedure 2002(a).

DATED this 11th day of March, 1997.

GIVENS PURSLEY & HUNTLEY, LLP

Ramona S. Neal

Counsel for The Travelers Insurance Company

## CERTIFICATE OF SERVICE

I hereby certify that on March 11, 1997 I caused to be served a true and correct copy of the foregoing to each of the persons named below by the method indicated below each of their names.

Leslie M. Bock Dillion Bosch Daw & Bock 242 N. 8th Street, Suite 200 Boise, ID 83702 旦 U.S. Mail □ Fax □ By hand □ Overnight	Howard R. Foley FOLEY & FREEMAN 77 E. Idaho Street, Suite 300 P.O. Box 10 Meridian, ID 83680 U.S. Mail  Fax By hand Overnight
John D. Harrington White Peterson Pruss Morrow & Gigray 104 9th Avenue S P.O. Box 247 Nampa, ID 83653-0247  Dus. Mail Fax By hand Overnight	Ronald D. Schoen Standing Chapter 12 Trustee P.O. Box 216 Payette, ID 83661 U.S. Mail  Fax  By hand  Overnight
Office of the U.S. Trustee 304 N. 8th St., Suite 347 P.O. Box 110 Boise, ID 83701 U.S. Mail  Fax  By hand  Overnight	Richard Boardman Penland Munther P.O. Box 199 Boise ID 83701 U.S. Mail Fax By hand Overnight

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